

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB  
MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**NOTICE OF MOTION OF SEAN MOREY, ALAN FANECA, BEN HAMILTON,  
ROBERT ROYAL, RODERICK CARTWRIGHT, JEFF ROHRER, AND SEAN  
CONSIDINE FOR LEAVE TO CONDUCT LIMITED DISCOVERY**

Sean Morey, Alan Faneca, Ben Hamilton, Robert Royal, Roderick Cartwright, Jeff Rohrer, and Sean Considine (collectively, "Movants") – all members of the settlement class – respectfully move for leave to conduct limited discovery in preparation for this Court's November 19, 2014 fairness hearing for the reasons set forth in the accompanying memorandum. At that time, this Court will assess whether the proposed settlement Class Counsel entered into with the NFL Parties is fair, adequate, and reasonable.

Dated: September 13, 2014

/s/ Steven F. Molo

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*Attorneys for Movants*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 13, 2014, I caused the foregoing Notice of Motion for Leave to Conduct Limited Discovery, Proposed Order, and Limited Discovery Requests to be filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties.

*/s/ Steven F. Molo*  
Steven F. Molo